

FAX COVER SHEET

DATE: February 27, 2004

TO: Davic McKay

FROM: Jenny Bandigan-Nesladek

FAX NUMBER: 202-720-4265

NUMBER OF PAGES: 3
(including cover sheet)

February 27, 2004

Re: Conservation Security Program (CSP) Proposed Rule

Dear Secretary Veneman,

My husband and I live in a farm owned by my husband's family located in Cuming County, Nebraska. I am writing to you to voice out my opinion that matters to us family farmers.

I am disappointed in the shortcomings of the proposed rule for the Conservation Security program and I urge you to issue a supplemental or revised rule reflecting the new law restoring the CSP's entitlement funding status. I also have some key concerns that should be addressed in a revised rule to bring the draft program implementation design in line with the requirements of the CSP section of the 2002 Farm Bill. Please issue this in a timely fashion, without adding significantly to the length of the existing public comment period, so farmers can still enroll in the program this year.

The proposed rule fails to provide a nationwide program available to all farmers and ranchers in all regions of the country who are practicing effective conservation, as required by law. It limits CSP eligibility to farmers and ranchers within a small number of watersheds and, within those watersheds, to certain "enrollment categories and subcategories" of producers. This would result in vastly lower participation levels and far less progress in solving natural resource problems. The rule should be modified by removing the restrictions limiting enrollment to certain watersheds, certain classes of farmers and ranchers, and to a limited set of resource concerns.

In addition, the proposed rule sets the entry point too high. The highest NRCS conservation standards for soil and water quality would have to be achieved prior to becoming eligible for the CSP. This is in stark contrast to the law, which says that relevant conservation standards must be met as a result of participation in the CSP. For Tier 3 participants, the proposed rule would require every single NRCS conservation standard to have been met prior to enrollment. The proposal would deny access to farmers who are transitioning to sustainable agriculture. The rule should be modified to retain high environmental standards, but to allow farmers and ranchers to achieve those high standards while in the program.

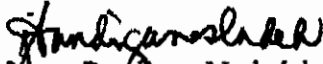
Instead of providing meaningful incentives and financial rewards for outstanding environmental effort and performance as envisioned by the law, the proposal demands that farm families cover the vast majority of costs of implementing and maintaining conservation systems out of their own pocket. The payment structure needs to be radically revised or the program has no hope of succeeding. The rule should establish cost-share rates on par with cost-share rates under other USDA conservation programs. Cost-share rates for newly installed practices should be equivalent to the rates under the Environmental Quality Incentives Program. Cost-share rates for the management and maintenance of existing conservation practices should be set at the 75% maximum rate established in the CSP law. Base payments should be set at the rates established in the CSP law, not the 90% reduced rate in the proposed rule.

Enhanced payments should reward the most environmentally-beneficial systems and, to the maximum extent possible, pay for results. Enhanced payments for on-farm research and demonstration projects and for on-farm monitoring and evaluation activities should allow the producer to recover costs. The enhanced payments for treating resource problems to management intensity levels beyond the current NRCS standards, for addressing additional resource problems, and for collective action within a watershed should not be treated as cost-share but rather as real bonuses to reward exceptional performance. A revised rule should also explicitly recognize resource-conserving crop rotations, rotational grazing and buffers as practices receiving substantial enhanced payments, as required by law.

I look forward to commenting on a revised proposed rule that describes a fair and workable program that works for family farmers and the environment.

Thank you.

Sincerely,


Jenny Bandigan-Nesladek
1387 H Rd.
West Point, NE 68788

March 1, 2004

Conservation Security Program Comments
ATTN: David McKay
NRCS Conservation Operations Division
P.O. Box 2890
Washington, DC 20013

My family raises livestock in Howard County, Missouri, and we are interested in using the Conservation Security Program that passed in the farm bill. We were hoping to gain some support for conservation practices that we could utilize on our farm.

I am writing to suggest important changes to the USDA's proposed rules CSP. The proposed rules cut back the funds for CSP and make it open only to a small number of farmers that live in watersheds selected by the federal government. I hope that you will fully fund CSP. It could be a large amount of money that supports farmers' income and a clean environment at the same time. I also hope that every farmer in the country will be eligible to participate in CSP, not just a few farmers who live in certain watersheds.

Thank you for your time. Please consider making these changes to the proposed rule.

Sincerely,

Mary Jo Lyon
1040 County Road 232
Armstrong, MO 65230